

Attachment 1

UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

)	CASE NO.
)	
Plaintiff(s),)	JUDGE BRIDGET MEEHAN BRENNAN
)	
v.)	<u>REPORT OF PARTIES' PLANNING</u>
)	<u>MEETING UNDER FED. R. CIV. P.</u>
Defendant(s).)	<u>26(f) AND L.R. 16.3(b)(3)</u>
)	
)	

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.3(b)(3), a meeting was held on _____, and was attended by:

_____ counsel for plaintiff(s) _____

_____ counsel for defendant(s) _____

1. The parties:

_____ will exchange the pre-discovery disclosures required by Fed. R. Civ. P. 26(a)(1) no later than five (5) business days before the Case Management Conference per the Court's Notice of Case Management Conference and Order.

— *or* —

_____ have not been required to make initial disclosures pursuant to Rule 26(a)(1)(B) because this matter falls into the excepted category of _____.

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2. The parties recommend the following case designation:

Expedited _____

Standard _____

Complex _____

Administrative _____

Mass Tort _____

Pursuant to Local Rule 16.2(b), if the recommended track designation is expedited, standard, or complex, the factors supporting such recommendation are

_____.

3. The parties have discussed whether this case is suitable for one or more of the following Alternative Dispute Resolution (“ADR”) mechanisms and inform the Court of their position as to the following options:

Early Neutral Evaluation _____

Mediation _____

Arbitration _____

Summary Jury Trial _____

Summary Bench Trial _____

Case not suitable for ADR _____

Case not suitable for ADR now, but may be after discovery _____

4. The parties **[do/do not]** consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

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5. With respect to electronically stored information, the parties: **[choose one]**

_____ agree to follow the default standard for discovery of electronically stored information (Appendix K to Northern District of Ohio Local Rules).

– *or* –

_____ will finalize an alternative agreement that sets out retention guidelines, search methodology, the format for production, and procedures for addressing attorney-work product or privileged information by _____.

6. The parties have discussed whether the Court should enter a protective order to facilitate discovery and state as follows: **[choose one]**

_____ agreed to the form protective order set forth in Appendix L to the Local Rules and will submit the proposed order to the Court no later than _____.

– *or* –

_____ will submit an alternative proposed protective order for the Court's consideration. Said proposed protective order will be submitted to the Court no later than _____ with an addendum setting forth the differences between the parties' proposed protective order and Appendix L to the Local Rules.

– *or* –

_____ disagree as to the necessity of a protective order.

– *or* –

_____ agree that a protective order is not necessary at this time.

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7. Recommended Discovery Plan:

- a. Describe the subjects on which discovery is to be sought and the nature and extent of discovery:

- b. State any discovery disputes or challenges anticipated by either party:

8. Recommended discovery cut-off date: _____.

9. Recommended cut-off date for amending the pleadings/and or adding additional parties:
_____.

10. Expert Discovery. Expert Discovery **[does/does not]** need to be concluded prior to the submission of dispositive motions.

Expert report(s) for party with the burden of proof: _____

Responsive expert report(s) due: _____

Expert discovery deadline: _____

11. Recommended dispositive motion deadline: _____

12. Recommended date for status conference: _____

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13. Other matters for the attention of the Court:

Attorney for Plaintiff(s) _____

Attorney for Defendant(s) _____
